

THE STATE OF SOUTH CAROLINA
Public Service Commission

YORK COUNTY, SOUTH CAROLINA

Docket No.: 2017-292-WS
REQUEST BY CAROLINA WATER SERVICE, INC. FOR RATE INCREASE

**PETITION TO INTERVENE OUT OF TIME
AS A PARTY OF RECORD**

York County, a body politic and political subdivision of the State of South Carolina, moves to Intervene and join in this action as a Party of Record, including but not limited to, participation in all hearings by offering testimony and exhibits and addressing the issue of the USIR and other relevant matters in this case, and be entitled to receive all motions, briefs, all correspondences, and all offers of settlement among the parties.

The reasons for this Petition are as follows:

1. Proposed ability to raise rates through a utility system improvement rate ("USIR") without the need for filing a new general rate case presents a matter of first impression in South Carolina; prevents the citizen-consumers and customers of Carolina Water Service, Inc. ("CWS") the ability to challenge the reasonableness of any proposed USIR rate increase; eliminates the ability of any reviewing party or agency to thoroughly check the propriety of the rate increase request through inspection, audit, and examination; creates an administrative process which counter to the long established public measures of checking proposed rate increases through a detailed vetting and evaluative process; and, asks the Public Service Commission to legislate a process absent in our SC Code and Regulations.
2. There is currently no Advocate representing consumers in utility matters in the State of South Carolina.
3. The prospect of a USIR is a matter of importance for our South Carolina citizen-consumers and customers of CWS.
4. Lastly, York County contends that the filing of the matter out of time does not prejudice the applicant due to the incipient state of the rate case with the Revised Notice of Filing being published in York County on December 14, 2018; that Notice of the USIR request is not evident from the face of the application; and, that once York County appreciated the USIR component of the application, it undertook appropriate action to

authorize the Intervention Out of Time. Therefore, York County requests that the Commission grant York County's Petition.

Respectfully submitted by Counsel representing Petitioner,

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January 23, 2018
York, South Carolina